

To: 'Leonard, Edward L.'[leonardel@cdmsmith.com]; Kwan, Caroline[kwan.caroline@epa.gov]
Cc: 'Prabhu, Chitra (cprabhu@louisberger.com)'[cprabhu@louisberger.com]; 'Mayo, Joseph'[MayoJJ@cdmsmith.com]; Vaughn, Stephanie[Vaughn.Stephania@epa.gov]; Schmidt, Mark[schmidt.mark@epa.gov]
From: Weissbard, Ron
Sent: Thur 2/2/2017 9:30:55 PM
Subject: RE: NYC's request for RI review extension

Here is a list of major topics of concern.

1) Upland Sites :

- a. Historical and ongoing impacts
- b. NAPL seeps and GW impacts from upland sites

2) Contaminant Fate and Transport:

- a. Current transport only based on solids transport, presence of third phase/NAPL should be included
- b. Mechanisms such as ebullition, GW transport mobilize NAPL to the surface sediments daily

3) CSO Impacts: RI makes arbitrary statements regarding the impacts of CSOs on the Site

4) Groundwater:

- a. Groundwater CSM is based on an inappropriate and incorrectly-scaled tidal-cycling model, relies on spurious data and calculations, and over-applies limited data. *Measurements* show interpolations and calculations by AQ/NCG to be wrong.
- b. The groundwater CSM does not account for documented discharge and contaminant loading through the Creek banks from upland sites.
- c. The RI mistakes groundwater-surface water mixing in the shallow surface water as being a reduction in contaminant loading.

5) Sediment Transport

- a. Complexities in sediment transport model, prop wash re-suspension, approximated geomorphic feedback, wash load, etc., not proven necessary
- b. Incomplete characterization of solids loadings

c. Poorly justified faster settling rate for East River solids than for point source solids

Ron Weissbard, P.E./Acting Director of Superfund

NYC Environmental Protection/Sustainability

(O)718-595-5186/ (C) 201-704-1401/ rweissbard@dep.nyc.gov

From: Leonard, Edward L. [mailto:leonardel@cdmsmith.com]

Sent: Wednesday, February 01, 2017 4:28 PM

To: Weissbard, Ron <RWeissbard@dep.nyc.gov>; 'Kwan, Caroline' <kwan.caroline@epa.gov>

Cc: 'Prabhu, Chitra (cprabhu@louisberger.com)' <cprabhu@louisberger.com>; Mayo, Joseph <MayoJJ@cdmsmith.com>; 'Vaughn, Stephanie' <Vaughn.Stephania@epa.gov>; 'Schmidt, Mark' <schmidt.mark@epa.gov>

Subject: RE: NYC's request for RI review extension

Ron

Can you provide a list of the major RI and modeling topics you intend to discuss so we can schedule the appropriate staff. Getting the high level comments on 2/17 will be too late for scheduling the needed staff.

Thanks

Ed

Edward Leonard, CHMM

CDM Smith

110 Fieldcrest Avenue, 6th Floor

Edison, NJ 08837

Office: 732-590-4695

Fax: 732-225-7851

Cell: 732-372-8909

From: Weissbard, Ron [<mailto:RWeissbard@dep.nyc.gov>]
Sent: Wednesday, February 01, 2017 4:19 PM
To: 'Kwan, Caroline' <kwan.caroline@epa.gov>
Cc: 'Prabhu, Chitra' (cprabhu@louisberger.com)' <cprabhu@louisberger.com>; Leonard, Edward L. <leonardel@cdmsmith.com>; Mayo, Joseph <MayoJJ@cdmsmith.com>; 'Vaughn, Stephanie' <Vaughn.Stephanie@epa.gov>; 'Schmidt, Mark' <schmidt.mark@epa.gov>
Subject: RE: NYC's request for RI review extension

Caroline,

Let me know if Tuesday 2/21 would work for your team for an in-person meeting or call, we would provide comments Friday 2/17.

As you are well aware this is a complex and massive document and set of models, so more time is needed. The bulk of comments will be available March 15, with final comments on the sediment transport model available end of March. This would be a 30-day extension, which is relatively short compared to the project scope and the number of extensions other parties have received. We believe this will actually have a net result in shortening the overall duration of the project as it will result in a better document with fewer iterations and revisions.

Thanks

Ron Weissbard, P.E./Acting Director of Superfund

NYC Environmental Protection/Sustainability

(O)718-595-5186/ (C) 201-704-1401/ rweissbard@dep.nyc.gov

From: Kwan, Caroline [<mailto:kwana.caroline@epa.gov>]
Sent: Tuesday, January 31, 2017 3:01 PM
To: Weissbard, Ron <RWeissbard@dep.nyc.gov>
Cc: Prabhu, Chitra (cprabhu@louisberger.com) <cprabhu@louisberger.com>; Edward Leonard <leonardel@cdmsmith.com>; Mayo, Joseph <MayoJJ@cdmsmith.com>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Schmidt, Mark <schmidt.mark@epa.gov>
Subject: NYC's request for RI review extension

Hi Ron:

As a follow-up to our meeting on January 20, 2017 concerning the RI Report review schedule, please provide EPA the following.

- The date when the high level comments on the RI Report, including the models, will be provided.
- Proposed date to schedule a conference call or meeting before February 15, 2017 to discuss these high level comments.

To keep on schedule EPA expects all stakeholders and NYC comments by February 28, 2016. However, note that the EPA review schedule does assume that conference calls and/or meetings to discuss comments submitted will be necessary and included time in the schedule during the month of March 2016 to conduct these calls/meeting with all stakeholders and NYC.

Please let me know if you have any questions.

Caroline Kwan

Project Manager

Special Projects Branch

U.S. Environmental Protection Agency

290 Broadway, 20th Floor

New York, NY 10007-1866

(212) 637-4275

kwan.caroline@epa.gov